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Attorney for:  
**CHARLES BARRETT**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,	)	Case No.: 1:22-cr-00213-JAM-BAM
	)	
Plaintiff,	)	
	)	<b>DEFENDANT CHARLES BARRETT'S</b>
vs.	)	<b>FORMAL OBJECTIONS TO</b>
	)	<b>PRESENTENCE REPORT</b>
CHARLES BARRETT,	)	
	)	DATE: May 21, 2024
Defendant.	)	TIME: 9:00 A.M.
	)	JUDGE: Senior District Judge John A. Mendez

Charles Barrett respectfully submits the following formal objections to the Presentence Report:

- 1) Reference to any arrests or other criminal conduct that was dismissed as irrelevant and prejudicial to Mr. Barrett;
- 2) The Offense Conduct as outlined in paragraphs 4 through 31. The court will be asked to rely upon the testimony provided at trial;
- 3) Force as to Counts 1 and 3: The defense objects to the +4 increase pursuant to USSG Sec. 2.A3.1(b)(1)(a);
- 4) Obstruction as to Counts 1,2,3: The defense objects to the +2 increase pursuant to USSG Sec. 3C1.1. This conduct was not testified to at jury trial and entirely speculative;
- 5) The defense objects to the criminal history score of 9 in paragraph 109 as overstated;
- 6) The defense objects to any victim impact statements other than what will be provided by K.G.

Dated: May 7, 2024

Respectfully submitted,

/s/ Timothy P. Hennessy  
Attorney for Mr. Barrett

/s/ David Torres  
Attorney for Mr. Barrett